

UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF NEW YORK

CONSUMER FINANCIAL  
PROTECTION BUREAU, et al.,

Plaintiffs,

v.

STRATFS, LLC (f/k/a STRATEGIC  
FINANCIAL SOLUTIONS, LLC), et  
al.,

Defendants, and

DANIEL BLUMKIN, et al.,

Relief Defendants.

Declaration of Terrence M.  
Connors, Esq.

Case No. 24-CV-40-EAW-MJR

MOTION ON BEHALF OF:

Intervenors Clear Creek Legal, LLC,  
Credit Advocates Law Firm, LLC,  
Greenstone Legal Group, Brandon  
Ellis Law Firm LLC, Hailstone Legal  
Group, Hallock and Associates, Harbor  
Legal Group, Anchor Law Firm,  
PLLC, Bedrock Legal Group, Boulder  
Legal Group, Canyon Legal Group,  
LLC, Great Lakes Law Firm,  
Heartland Legal Group, Level One  
Law, Meadowbrook Legal Group,  
Monarch Legal Group, Newport Legal  
Group, LLC, Northstar Legal Group,  
Option 1 Legal, Pioneer Law Firm  
P.C., Rockwell Legal Group, Spring  
Legal Group, Royal Legal Group, Slate  
Legal Group, Stonepoint Legal Group,  
The Law Firm of Derek Williams,  
LLC, Whitestone Legal Group,  
Wyolaw, LLC, Chinn Legal Group,  
LLC, Leigh Legal Group, PLLC,  
Hallock & Associates LLC, Gustafson  
Consumer Law Group, LLC, Michel

Law, LLC, The Law Office of Melissa Michel LLC, and Moore Legal Group, LLC. (collectively, the “Law Firms”), by and through their attorneys Connors LLP

DATE, TIME, AND PLACE OF MOTION:

To be determined by this Court before the Hon. Michael J. Roemer, United States Magistrate Judge, Robert H. Jackson United States Courthouse, 2 Niagara Square, Buffalo, New York 14202.

Oral argument is requested.

RELIEF REQUESTED:

An Order modifying the Preliminary Injunction (Dkt. 184) to allow the processing and timely payment of a claim submitted by the Law Firms against a captive insurance policy at Cell Gramercy 2 of Contego Insurance, Inc., and to allow the processing and payment of future claims up to the policy’s limit.

GROUND FOR RELIEF REQUESTED:

This Court’s March 4, 2024 Preliminary Injunction Order (Dkt. 184); Utah Code 31A-37-104; and this Court’s inherent authority.

SUPPORTING PAPERS:

Declaration of Terrence M. Connors, Esq., dated March 22, 2024, with exhibits, and the accompanying Memorandum of Law.

The Law Firms intend to submit reply papers.

DATED: Buffalo, New York  
March 22, 2024

/s/ Terrence M. Connors  
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